



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 5
 77 WEST JACKSON BOULEVARD
 CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF
 LU-16J

Via E-mail and Certified Mail 7014 2870 0001 9579 3876
 RETURN RECEIPT REQUESTED

June 3, 2019

Mr. Joseph M. Bianchi
 Group EHS Manager
 Amphenol Corporation
 40-60 Delaware Avenue
 Sidney, NY 13838

Subject: *Off-Site Interim Measure Conceptual Design*, dated May 7, 2019 and the
May 16, 2019 Off-site Interim Measure Conceptual Design Addendum
 Franklin Power Products, Inc./Amphenol Corporation
 Administrative Order on Consent, Docket # R8H-5-99-00
 EPA ID# IND 044 587 848

Dear Mr. Bianchi:

Thank you for preparing and submitting the document *Off-Site Interim Measure Conceptual Design* (Conceptual Design), dated May 7, 2019 and the *Off-site Interim Measure Conceptual Design Addendum*, dated May 16, 2019. By June 18, 2019, please prepare and submit the next phase of the sewer line remedial design based on the enclosed comments and the direction provided in EPA's request for a work plan dated December 11, 2018.

If you have any questions or would like to schedule a meeting to discuss these comments, please contact me at (312) 886-3020.

Sincerely,

Carolyn Bury
 Project Manager
 Remediation Branch

Enclosure

cc: Matt Kupcak, BorgWarner, Inc.

ecc: Brad Gentry, IWM Consulting Group, LLC.
Bhooma Sundar, RRB CAS2
Motria Caudill, ATSDR
Conor Neal, RRB CAS2

Enclosure to June 3, 2019 Letter to Amphenol Corp.

EPA comments on the May 7, 2019 *Off-Site Interim Measure Conceptual Design* and (“Conceptual Design”) and the May 16, 2019 *Off-site Interim Measure Conceptual Design Addendum* (“Addendum”). The Conceptual Design is being submitted as a component of the *Off-Site Interim Measure Work Plan* (Work Plan) for the Study Area.

General Comments

In a letter dated May 14, 2019, EPA required that Amphenol Corporation (Amphenol) provide a supplement to its May 7, 2019 Conceptual Design Document describing in detail the division of responsibilities between the City of Franklin and Amphenol. EPA also requested a copy of the May 6, 2019 agreement between the City of Franklin and Amphenol. On May 16, 2019, Amphenol Corporation provided the document *Off-site Interim Measure Conceptual Design Addendum* (“Addendum”) to further explain the cooperative logistics between Amphenol Corp and the City of Franklin. EPA has the following comments on both documents which must be addressed in the next version of the draft design work plan (“next design phase document”).

1. The aerial scope of the remedy must be explained and supported. A comparison of Figures 10 and 11 to figures displaying elevated VOC vapors in sewers and sewer-line soils shows that some impacted sewers are not included in the proposed remedy. Specifically, the eastern portion of Hamilton Avenue, portions of Glendale Drive, and the sewer connection between Glendale Drive and Forsythe Street. These areas having elevated VOC measurements are not included in the remedy. EPA notes that per the City’s 2015 Sewer System Evaluation Study, the City also planned to line the north/south western portion of Glendale Drive, ostensibly due to the line breaks recorded in the City’s video logging event.

In the next design phase, expand the remedial design scope to include all areas impacted with VOC vapors in the sewer lines. Alternatively, provide a justification why these other areas are not included in the current design scope.

2. The next design phase should include a discussion of how remediation performance will be confirmed post-construction.
3. The next design phase should include a list of potential contingency measures if remedial confirmation sampling reports that elevated VOC sewer vapors persist in the sewer lines.
4. Identify how long a re-lined clay pipe is expected to maintain its integrity and how the pipes will be monitored for deficiencies after replacement or re-lining.?
5. The remedy will remove contaminated soils in the vadose zone in designated sections of the sewer lines, and contaminated soils and groundwater in other sections of the sewer lines that intersect the water table. Based on the Conceptual Site Model described in Section 3.1, a smear zone could develop in

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the clean backfill. If the new PVC sewer line (e.g., joints) or the re-lined old clay pipe degrade in the future, how will renewed migration of VOC vapors be prevented in the future?

6. Given the post-remedial conditions of residual contaminated media, the next design phase should discuss how the remedy will be monitored into the future.
7. In the next design phase, discuss whether the City contractors will be HAZWOPER trained, or supervised by a responsible individual who can stop work if they are exposed above occupational exposure levels (e.g., IDEM RCG construction excavation levels). This comment also applies to the "other utility entities (i.e., municipal water company and natural gas company)" which will be invited to replace utilities and take advantage of open trench conditions. The utility companies could encounter contaminated soil during their work which could affect the schedule.
8. The City contractor must have its own health and safety plan. For practical reasons, Amphenol's and the City's contractor should have HASPs that are harmonized where they agree to the same PPE, action levels, and conditions that require upgrading or downgrading PPE, etc.
9. EPA assumes the following which should be explicit in the next design phase document:

Amphenol is responsible for

 - a. determining what material is contaminated and for contaminated materials management (i.e. removing, staging, and disposing of contaminated material).
 - b. materials management of non-contaminated material
10. In the next design phase, identify who will be supplying and verifying clean fill.
11. In the next design phase, identify whether pre-excavation or post-excavation surveys or related work will be required and who is responsible for doing that for sewer lines, water, and natural gas lines.
12. In the next design phase, identify who is supplying all construction materials for water lines and natural gas lines.

Specific Comments

13. Section 1.0 Introduction

Note that EPA requested the Conceptual Design in an email dated March 11, 2019, not just during the April 11, 2019 meeting with Amphenol Corporation ("Amphenol"). EPA also requested a conceptual design plan when we agreed to

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Amphenol's proposed plan to complete design-level soil sampling as a preliminary response to EPA's December 11, 2018 request for a remedial work plan for the sewer line remedy.

14. Section 2.0 Project Background

Page 1. In the discussion of previous remedial work, the status of the vapor mitigation system installed at the former manufacturing facility should be included.

15. Section 3.1 Conceptual site Model

Page 3. This section should point out that while the portion of the sewer line intersects the water table, VOC vapors still decrease towards the southern, downgradient end of the study area. Fluctuations of vapor concentrations, as were observed between the two sampling events, could potentially be explained by water table fluctuations and precipitation events.

Pages 3 and 4. Explain how groundwater conditions are expected to improve over time due to the remedy, given that only one area had VOC concentrations in the vadose zone above the IDEM soil to groundwater leaching value.

16. Section 5.3 Local Challenges

Page 7. Amphenol will determine whether the groundwater remediation system may need to be taken off line during construction, or periodically during construction. If the sewer system will not be bypassed and the pump and treat system is turned off, in the next design phase, provide an analysis of how far groundwater might move off-site and a plan for how the plume will be monitored, and whether the water table is expected to rise due to not pumping, and if that would affect the planned construction.

Minor Comments

17. Figure 1. Study Area Boundary The figure includes the extended study area boundary to the south where additional manholes were sampled as part of the sewer vapor investigation. In the next phase design, include the area to the west and south where additional groundwater sampling was completed.

Comments on Off-site Interim Measure Conceptual Design Addendum ("Addendum")

18. EPA noted that the "Right of Way Access, Repair and Payment Agreement between Amphenol and the City of Franklin" (Attachment A) ("Agreement") does not mention replacement or relining of sewer laterals.
19. Addendum - There appears to be a presumption that all waste collected for disposal will be non-hazardous. Either explain the presumption or revise the text

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to state that waste soil will be sampled and analyzed for the IDEM contained in determination.

20. Page 3. CrossRoads Engineers, P.C. will prepare a community relations plan. Please provide the draft plan to EPA so that we may ensure that any included risk information is communicated appropriately and is consistent with EPA's messaging.
21. Page 3. Please provide EPA with the draft SWPPP.

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